

Exhibit O



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May 27, 2022

VIA FEDERAL EXPRESS

Jaspal Chahal, Chief Legal Officer and General Counsel
Clarivate, PLC
Friars House
160 Blackfriars Road
London SE1 8EZ, United Kingdom

Ex Libris (USA), Inc.
Corporation Service Company
3366 Riverside Drive, Suite 103
Upper Arlington OH 43221

Re: MetaDoor Platform
Duty to Preserve Evidence Relevant to Potential Litigation

Jaspal Chahal:

Our firm, Squire Patton Boggs (US) LLP, has been retained by OCLC, Inc. ("OCLC") regarding the MetaDoor platform referenced above. Accordingly, please direct all future communications regarding this matter to me. As you are aware, on May 19, 2022, OCLC's General Counsel Julie Presas sent a letter to you requesting ExLibris, a Clarivate company ("ExLibris" or "you") to cease and desist any activities that involve interfering with and/or encouraging WorldCat subscribers to violate their contractual obligations to OCLC relating to the use of OCLC WorldCat records and/or from engaging in anti-competitive conduct. Since that time, not only have you not responded, but OCLC has learned that ExLibris is actively and openly engaging in illegal conduct, which will cause OCLC significant and irreparable harm. OCLC will be pursuing all available legal remedies against you and any other person or entity engaging in or assisting with the illegal conduct.

The purpose of this letter is to put you on notice of your legal obligation to preserve all evidence and materials that may be in your possession, custody, or control and are related in any way to the planning, strategy, development, training, and/or implementation of the MetaDoor platform.

As such, you are hereby given notice to preserve and maintain all written and electronic documents, records, information, correspondence, notes, text messages, instant messages, presentations, etc., including but not limited to any and all communications by and between any

45 Offices in 20 Countries

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of the Clarivate entities and/or affiliates and/or any Development Partners, which includes but is also not limited to the following:

- University of Minnesota
- Southern Methodist University
- Brandeis University
- University of Delaware
- SLSP Swiss Library Service Platform
- The National Library of Israel
- Washington Research Library Consortium
- Florida Gulf Coast University
- The University of Tennessee Chattanooga

Additionally, you and your client are hereby given notice not to destroy, conceal, or alter any paper or electronic files, other data generated by and/or stored on your client's computer systems and storage media (e.g., hard disks, floppy disks, back-up tapes, cloud services, compact disks, flash drives), or any other electronic data, such as voicemail and/or text messages, relating to this matter until further written notice from the undersigned. This includes, but is not limited to: e-mail and other electronic communications; word processing documents; spreadsheets; databases; calendars; telephone logs; contact manager information; internet usage files; offline storage or information stored on removable media; information contained on laptops or other portable devices, including mobile telephones; and network access information.

This also includes halting routine business practices geared to the destruction of potential evidence. This includes, but is not limited to: server back-up tape rotation; electronic data shredding; scheduled destruction of back-up media; re-imaging of drives; drive hardware exchanges; sale, gift, or destruction of computer systems; defragmentation; and maintenance routines. This also includes the need to preserve any metadata on any electronic documents.¹

Through discovery we expect to obtain from you a number of documents and other data, including files stored on your computers and storage media. The preservation of the electronic evidence is in addition to any steps that must be taken to preserve hard copy documentary evidence and is not intended to suggest that only electronic evidence must be preserved. Further, the following list is not intended to be exclusive of the types of electronic evidence to be preserved. In particular, we expect to seek information related to the following:

1. The events leading up to and including the conceptualizing, development, implementation, and production of MetaDoor;
2. Any and all communications and correspondence between you and the Development Partners, including but not limited to those partners listed above;

¹ Metadata is underlying, background data that provides information about or documentation of other data managed within an application or environment. Viewing, printing, e-mailing, altering, etc. of a document will affect its metadata.

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3. Any and all communications by and between ExLibris and/or any other employee, consultant, independent contractor or agent of Ex Libris or any of its related or affiliated entities; and
4. Any and all communications, correspondence, documents or records relating to requests for access to, distribution or sharing of, OCLC WorldCat records by OCLC customers for the development of MetaDoor.

Although we may bring a motion for an order preserving documents and other data from destruction or alteration, your client's obligation to preserve documents and other data for discovery in this case arises independently from any such order, motion, or preservation notice.

This letter describes the evidence OCLC intends to seek in connection with future litigation and provides notice that these preservation obligations reach every custodian and every type of discoverable data as warranted by law. Until such time as we can make arrangements for the discovery of such documents, please continue to maintain them as they are kept in the ordinary course of business. However, be advised that booting a drive, examining its contents or running any application will irretrievably alter the evidence it contains and may constitute unlawful spoliation of evidence. ***Failure to take every reasonable step to preserve this information until final resolution of this matter could result in extreme penalties against you and your client, including damages and evidentiary and monetary sanctions.***

Should you have any questions or concerns, please do not hesitate to contact me.

Regards,

Squire Patton Boggs (US) LLP

Traci L. Martinez

Traci L. Martinez

Copy:

Christopher H. Gordon, Squire Patton Boggs (US) LLP

Jeffrey Walker, Squire Patton Boggs (US) LLP

OCLC, Inc.